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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING JOINT  
SUBMISSION RE: SEALING PORTIONS  
OF ORDER ADOPTING IN PART AND  
MODIFYING IN PART THE SPECIAL  
MASTER'S REPORT AND  
RECOMMENDATION ON REFERRED  
DISCOVERY ISSUES RE  
PRESERVATION PLAN (DKT. 587)**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is the Parties' Joint Submission Re: Sealing Portions of Order Adopting in Part and Modifying In Part the Special Master's Report and Recommendation on Referred Discovery Issues re Preservation Plan (Dkt. 587). Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Documents Sought to be Sealed</b>	<b>Court's Ruling on Motion to Seal</b>	<b>Reason(s) for Court's Ruling</b>
Order Adopting in Part and Modifying In Part the Special Master's Report and Recommendation on Referred Discovery Issues re Preservation Plan (Dkt. 587)	GRANTED as to Portions of Order at:  Pages 7:20-21, 7:23-25, 8:14  GRANTED as to Portions of Exhibit A to Order at:  Pages 2-3	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE SUSAN VAN KEULEN  
United States Magistrate Judge